

October 2, 2015

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**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications, PS Docket No. 15-80; New Part 4 of the Commission's Rules Concerning Disruptions to Communications, ET Docket No. 04-35**

Dear Ms. Dortch:

On September 30, 2015, Andis Kalnins, Gregory Romano, Nneka Chiazor and Robert Morse of Verizon met with Jeffery Goldthorp, John Healy, Jerry Stanshine and Julia Tu of the Public Safety and Homeland Security Bureau to discuss issues in the above-referenced proceeding.

We discussed several issues addressed in Verizon's comments and reply comments regarding proposed changes to the Commission's Part 4 Rules. We reiterated that changes related to "partial" 9-1-1 network outages were unnecessary and would be burdensome to administer, and the need for a minimum three-day period for reporting simplex outages for high-capacity facilities (OC3 or higher). We discussed replacing the current wireless 900,000 user minutes threshold with a new geography-based threshold, and recommended that staff continue to work cooperatively with service providers to gather data on high volume wireless calling events outside of NORS through ad hoc outreach or an informal process akin to DIRS-lite. Any extension of special office outage reporting to Telecommunications Service Priority circuits should be limited to major facilities in service. And we restated Verizon's support for disclosing outage reports to state regulatory commissions, subject to strong confidentiality protections.<sup>1</sup>

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,



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<sup>1</sup> Comments of Verizon (July 16, 2015); Reply Comments of Verizon (July 31, 2015).